

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Creation of a Low
Power Radio Service

MM Docket No. 99-25

To: The Commission

FURTHER REPLY COMMENTS


EDGEWATER BROADCASTING, INC. ("EB") and **RADIO ASSIST MINISTRY, INC. ("RAM;"** and together with EB, the "*Ministries*"), hereby submit additional reply comments regarding certain issues related to low power FM ("*LPFM*") raised in connection with the *Third Report and Order and Second Further Notice of Proposed Rulemaking, Creation of a Low Power Radio Service ("Third R&O ")*, 22 FCC Rcd 21912 (2007).

The Ministries understand that an item related to this Docket is currently on circulation before the Commission. The Ministries wish to reiterate from its earlier filings in this Docket that a) neither the Ministries, nor any other 2003 FM Translator Filing Window applicant, should be penalized for properly and timely filing during the Auction 83 window, b) the ten (10) application limit pronounced by the Commission in its *Third R & O* is arbitrary and capricious and c) the elevation of LPFM over FM Translators runs afoul of Section 307(b) of the Act. Furthermore, the Ministries endorse the proposals put forth by Educational Media Foundation in their various pleadings in this Docket, but particularly their March 24, 2010 letter to the Commission requesting that the Commission allow the interested parties to reach a mutually acceptable negotiated solution to the con-

flicts between LPFM and FM Translators prior to the Commission's resolution of this matter. Such a measured approach will avoid further delay and litigation. Thus, resolving these important service matters.

Respectfully submitted

EDGEWATER BROADCASTING, INC.
&
RADIO ASSIST MINISTRY, INC.

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